

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Global Brokerage, Inc. f/k/a FXCM Inc.  
Securities Litigation

Master File No. 1:17-cv-00916-RA

CLASS ACTION

**DECLARATION OF ISRAEL DAHAN**

Israel Dahan, hereby declares pursuant to 28 U.S.C. § 1746, as follows:

1. I am a partner in the law firm of King & Spalding LLP and one of the attorneys representing Defendants Global Brokerage, Inc. f/k/a FXCM Inc., Dror Niv, William Ahdout, David Sakhai, Eduard Yusupov, Janelle G. Lester, Robert Lande, Ornit Niv, Nicola Santoro, Jr., Margaret Deverell, David S. Sassoon, Kenneth Grossman, James Brown, Ryan Silverman, Arthur Gruen, Robin E. Davis, Eric LeGoff, and Bryan Reyhani in the above-captioned action. I am duly admitted to this Court. I respectfully submit this Declaration in support of Defendants' Motion to Strike and Dismiss Plaintiffs' Consolidated Securities Class Action Complaint.

2. Attached as Exhibit A to this Declaration is a true and correct copy of relevant excerpts of FXCM SEC Form 10-K 2015 Annual Report, filed March 11, 2016.

3. Attached as Exhibit B to this Declaration is a true and correct copy of relevant excerpts of FXCM SEC Form 10-K 2014 Annual Report, filed March 16, 2015.

4. Attached as Exhibit C to this Declaration is a true and correct copy of relevant excerpts of FXCM SEC Form 10-Q for the third quarter of 2014, filed November 7, 2014.

5. Attached as Exhibit D is the National Futures Association's ("NFA") Decision issued in *In the Matter of Forex Capital Markets, LLC, et al.*, NFA Case No. 17-BCC-001 (Feb. 6, 2017).

6. Attached as Exhibit E to this Declaration is a true and correct copy of relevant excerpts of FXCM SEC Form 10-K 2016 Annual Report, filed March 20, 2017.

7. Attached as Exhibit F is a chart comparison of the allegations in Plaintiffs' Complaint to the allegations in the CFTC Order and the NFA Complaint.

8. Attached as Exhibit G is Effex Capital, LLC's complaint asserting a defamation action against the NFA, filed as *Effex Capital, LLC v. National Futures Association*, No. 1:17-cv-04245 (N.D. Il. June 6, 2017).

9. Attached as Exhibit H to this Declaration is a true and correct copy of relevant excerpts of FXCM SEC Form 10-K 2011 Annual Report, filed March 15, 2012.

10. Attached as Exhibit I to this Declaration is a true and correct copy of relevant excerpts of FXCM SEC Form 10-K 2012 Annual Report, filed March 18, 2013.

11. Attached as Exhibit J to this Declaration is a true and correct copy of relevant excerpts of FXCM SEC Form 10-K 2013 Annual Report, filed March 17, 2014.

I DECLARE UNDER PENALTY OF PERJURY THAT THE ABOVE STATEMENTS ARE TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF.

Dated: August 3, 2017

  
Israel Dahan